



Shaklee Corporation

SEP 20 2004

September 3, 2004

Office of Nutritional Products, Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Re: 403(r)(6) Notification

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act, Shaklee Corporation hereby notifies FDA that it has begun using the following statements:

- FlavoMax™ provides all six of the most important classes of flavonoids – powerful water-soluble plant nutrients that deliver potent antioxidant protection to the blood and blood-rich tissues, especially the liver and intestines. Flavonoids defend the body against the destructive actions of free radicals, promoting overall cell health and providing support for protection against cellular damage.
- For the best, most complete antioxidant protection, take FlavoMax and CarotoMax.
- Introducing FlavoMax™ and CarotoMax® from Shaklee – Maximum potency for the most powerful antioxidant protection you can buy!
- Supports circulation, capillary strength, and cardiovascular health.
- FlavoMax and CarotoMax were designed to work in synergy with the essentials so you can maximize your arsenal of protection with a potent and powerful super antioxidant shield.
- Shaklee found a way to maximize your antioxidant protection. We developed a dynamic antioxidant protection. We developed a dynamic antioxidant duo: water-soluble FlavoMax™ and fat-soluble CarotoMax®. Working together, these nature-based supplements provide a broad spectrum of high-power antioxidants that help protect cells from free radical damage.
- FlavoMax™ is a comprehensive, high-powered antioxidant supplement

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- Delivers powerful free radical fighters to the blood and blood-rich tissues, such as the liver and intestines
- Promotes overall wellness
- Citrus/Lemon bioflavonoids provide free radical scavengers that bolster the body's defense systems
- Elderberry supports healthy cardiovascular function
- Proanthocyanidin flavonoids in grapeseed increase the antioxidant capacity of the blood.
- Grapeseed extract promotes cardiovascular health by protecting the health of arteries
- Grapeseed extract – Shown to have many times the antioxidant activity of vitamins C & E in laboratory studies
- Green tea flavonoids help scavenge free radicals in the bloodstream.
- Green tea extract – Shown to help maintain healthy hearts
- Green tea extract – Used for centuries to support the immune system
- Quercetin – Maintains healthy lungs
- Quercetin – Protects against oxidation of LDL (so-called “bad”) cholesterol
- Taken together, CarotoMax and FlavoMax provide a broad spectrum of antioxidant protection.
- FlavoMax and CarotoMax provide some of the most potent antioxidants found in fruits and vegetables.
- When combined, deliver the most potent mix of antioxidants in the world
- Two powerful phytonutrient classes offer potent antioxidant protection
- Maximize your antioxidant protection with new FlavoMax™ and improved CarotoMax®!
- The most potent sources [of flavonoids and carotenoids] available



Shaklee Corporation

which contain the statutory statement, on the label and labeling for the following product:

FlavoMax™ Dietary Supplement

I certify that the foregoing is complete and accurate, and that Shaklee Corporation has substantiation that the statements are truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read "Les Wong", with a long horizontal stroke extending to the right.

Les Wong
Director Health Sciences

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